

### REMARKS

In the January 10, 2005 Office Action, the drawings and specification were objected to and claims 1-6 and 9-20 stand rejected in view of prior art, while claims 7 and 8 were indicated as containing allowable subject matter. Claims 3, 4, 7, 8, 18 and 19 were also rejected for failing to indicate and claim particularly and distinctly the subject matter that Applicants regard as the invention. No other objections or rejections were made in the Office Action.

#### ***Status of Claims and Amendments***

In response to the January 10, 2005 Office Action, Applicants have amended the specification, drawings, and claims 1-3, 5-9, 11, 15, 16 and 18-20, and have canceled claim 4 as indicated above. Applicants wish to thank the Examiner for the indication of allowable subject matter and the thorough examination of this application. Thus, claims 1-3 and 5-20 are pending, with claims 1, 9, 11, 15, 19 and 20 being the only independent claims. Reexamination and reconsideration of the pending claims are respectfully requested in view of above amendments and the following comments.

#### ***Specification***

In paragraph 2 of Office Action, the specification was objected to for failing to clearly identify the priority claims in the first section. In response, Applicants have amended the specification to insert the heading "Cross-Reference To Related Application" and to move the original paragraph [00147] for incorporating the entire disclosures of the prior Japanese applications to the first section of the specification (i.e., after the title of the invention in page 1) as indicated above.

Moreover, the Office Action indicates the incorporation of the disclosures of the prior Japanese applications by reference is technically improper because translated copies of the

certified priority documents have not been submitted. Applicants respectfully disagree with the assertion of the Office Action that the incorporation by reference is improper.

Specifically, 37 CFR 1.55(4) stipulates that "[a]n English language translation of a non-English language foreign application is *not required*" (emphasis added) except for particular situations such as when necessary to overcome the date of a reference, or when specifically required by the examiner. Applicants believe any of the conditions enumerated in 37 CFR 1.55(4), which requires the submission of English translation of the priority documents, does not currently apply to the present application. Thus, English translated copies of the prior Japanese applications are not currently required under 37 CFR 1.55(4).

Moreover, Applicants note that the incorporation of the prior foreign application in the U.S. application is discussed in MPEP 201.13 II. RIGHT OF PRIORITY (35 U.S.C. 119 (A)-(D) AND 365) BASED ON A FOREIGN APPLICATION FILED UNDER A BILATERAL OR MULTILATERAL TREATY, Section G. Incorporation by Reference. This section of MPEP explicitly provides an applicant of a U.S. application with an option to incorporate the foreign priority application by reference by including a statement in the U.S. application-as-filed that such specifically enumerated foreign priority application is "hereby incorporated by reference". MPEP further discusses such incorporation by reference will permit an applicant to amend the U.S. application to include any subject in the foreign priority application without raising the issue of new matter.

In view of the above, the Applicants believe the incorporation of the prior Japanese applications by reference in the present application is proper. Accordingly, Applicants respectfully request withdrawal of the objection to the incorporation by reference.

In paragraph 3 of the Office Action, the specification is objected because the paragraph [0023] in page 4 contains a typographical error. In response, Applicants have amended the

paragraph [0023] to correct the typographical error. Applicants believe the paragraph [0023] is now correct, and thus, respectfully request withdrawal of the objection.

In paragraph 4 of the Office Action, the definition of the phrase "substantially cancels" described in the paragraph [0034] is objected because the phrase "substantially cancels" is still indefinite. In response, Applicants have amended claims of the present application to eliminate the use of the phrase "substantially cancels" in the claims. Moreover, Applicants have reconciled the two definitions of "substantially" as used in the specification in the newly added paragraph [0033.4] as indicated above.

Under the 37 CFR §1.75(d)(1), the description in the specification is required to provide a clear support or antecedent basis for the terms and phrases *used in the claims* so that the meaning of the terms in the claims can be determined by referring to the description. Since the phrase "substantially cancels" is no longer used in the claims of the present application, Applicants believe the phrase "substantially cancels" is not required to be defined further in the specification. Thus, withdrawal of the objection is respectfully requested.

In paragraph 5 of the Office Action, it is required to move the original paragraphs [0143] to [0146] to the beginning of the application. In response, Applicants have amended the specification to add new paragraphs [0033.1] to [0033.4] in the beginning portion in "DETAILED DESCRIPTION OF THE PREFERRED EMBODIMENTS", and to delete the original paragraphs [00143] to [00146]. The new paragraphs [0033.1] to [0033.4] substantially correspond to the original paragraphs [0143] to [0146] except for the last sentence in the paragraph [0033.4] that is added to reconcile the two definitions of "substantially" as mentioned above. Thus, Applicants respectfully request withdrawal of this objection.

In view of above, Applicants believe that the specification is now correct and complies with 37 CFR §1.71 and 37 CFR §1.75(d)(1). Withdrawal of the objections is respectfully requested.

### *Drawings*

In paragraphs 7 to 9 of the Office Action, the drawings were objected to as failing to comply with 37 CFR §1.83(p)(4) or (5).

More specifically, Figures 1 and 2 were objected under 37 CFR §1.83(p)(5) because Figures 1 and 2 do not contain a display device 100 recited in the paragraph [0035] in the specification. In response, Applicants have amended the paragraph [0035] in the specification to clarify that the display device 100 is described in Figure 3.

Also, Figure 1 was further objected under 37 CFR §1.83(p)(5) because Figure 1 does not contain a vehicle motion detection section 101, a seat surface pressure detecting section 102 and a human body database section 103 as recited in the paragraph [0036] in the specification. In response, Applicants have amended the paragraph [0036] in the specification to clearly describe the correspondence of the description of the various parts of the display device to Figures 1 to 3.

Furthermore, the drawings are objected under 37 CFR §1.83(p)(4) and (5) because Figure 8 contains reference numerals for steps S100, S110, S120 and S130 that are also used in Figure 4, instead of reference numerals for steps S280, S290, S300 and S310 as recited in the paragraphs [0083] to [0085] in the specification. In response, Applicants attached a replacement sheet of drawing that includes changes to Figure 8. Figure 8 is amended in the attached sheet of drawing so that Figure 8 includes correct reference numerals for steps S280 to S310 in accordance with the paragraphs [0083] to [0085] in the specification. In other words, the reference numerals S100 to S130 in the original sheet including Figure 8 were

replaced by S280 to S310, respectively, in the attached replacement sheet of drawing that includes Figure 8.

Accordingly, Applicants believe the drawings now comply with 37 C.F.R. 1.84(p)(4) and (5). Thus, withdrawal of the objections is respectfully requested.

***Claim Rejections - 35 U.S.C. §112***

In paragraph 11 of the Office Action, claims 3, 4, 7, 8, 18 and 19 were rejected under 35 U.S.C. §112 second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention.

Specifically, claims 3, 4 and 18 were rejected because the term "substantially" in claims 3, 4 and 18 is indefinite. In response, Applicants have amended claims 3 and 18, and canceled claim 4 as indicated above. The claims are amended to eliminate the use of the term "substantially" and to clarify the subject matter of the present invention. Thus, Applicants believe the objection as it is applied to the term "substantially" in claims 3, 4 and 18 is now moot. Withdrawal of the objection is respectfully requested.

Moreover, claims 7 and 8 were rejected because the term "physique" in claims 7 and 8 is allegedly a relative term that renders the claims indefinite. Applicants respectfully disagree with this assertion of the Office Action. Applicants believe the term "physique" is a well defined, commonly known term. In other words, the term "physique" should be interpreted in accordance with an ordinary meaning that is well accepted in public. For example, the American Heritage® College Dictionary (Third Edition) defines the term "physique" as "[t]he body considered with reference to its proportions, muscular development, and appearance" and "bodily structure or development". It is clear from such definition that the one of ordinary skilled in the art would reasonably understand the term "physique" as used in the claims 7 and 8.

Accordingly, Applicants believe claims 7 and 8 are not indefinite. Thus, Applicants respectfully request withdrawal of the rejection to claims 7 and 8.

Furthermore, claim 19 was rejected as failing to comply with the proper means-plus-function language. In response, Applicants have amended claim 19 to delete preceding words of the term "means". Applicants believe claim 19 is now clearly comply with 35 U.S.C. §112. Withdrawal of the rejection to claim 9 is respectfully requested.

In paragraph 12 of the Office Action, claims 9-14 were rejected as being incomplete for omitting essential elements. The Office Action indicates the omitted element is a limitation reciting "the center deviation cancellation is preformed with respect to the original position of the display".

Applicants respectfully disagree with the assertion of the Office Action that the limitation of the "the center deviation cancellation is preformed with respect to the original position of the display" is an essential element in claims 9-14. Specifically, the center deviation is computed based on the positional relationship between the display region of the display section and the image displayed in the display region. In other words, the original position of the display section (before the display section is moved) is not essential in performing the center deviation cancellation. Rather, the center deviation cancellation is performed with respect to the translated position of the display section so that the center position of the image and the center position of the display region of the display section become closer after the image is shifted.

Thus, Applicants have added the limitation reciting the center deviation is computed ***based on a translated position of the display section***. Accordingly, Applicants believe claim 9 now more clearly describes the present invention. Thus, Applicants respectfully request withdrawal of the rejection to claims 9-14.

In paragraph 13 of the Office Action, claims 4-8 were rejected as being indefinite for reciting the passenger motion determining section is "configured and arranged to determine a passenger motion value indicative of a movement of a head portion of the passenger".

Although claim 4 has been canceled in the current Amendment, the limitation that is substantially similar to the original claim 4 is added<sup>1</sup> to independent claim 1 in this Amendment.

In the paragraph 13 of the Office Action, the Office Action apparently asserts (1) the limitations recited in claim 4 are not commensurate with the function of the passenger motion estimating section 104 described in the first embodiment of the present invention, (2) it is not clear which embodiments the limitations in claim 4 are directed to, and (3) claim 4 is indefinite because the sensors cannot reliably predict the head position of the passenger. Applicants respectfully disagree with the assertions of the Office Action.

First, the limitation of "**determining** a viewer motion value indicative of a movement of a head portion of the viewer" as amended in claim 1 is not limited to actually detecting a movement of the head portion, but rather, this language should be interpreted as also covering **estimating** a movement of the head portion of the viewer. In the first embodiment of the present invention, the passenger motion estimating section 104 is configured and arranged to **estimate** a movement of the head portion of the passenger by reading information indicating the head motion of a person having a physique and posture similar to those of the passenger from the human body database based on the detection value indicating the body pressure distribution and the detecting value indicating the vehicle motion. On the other hand, in the second embodiment of the present invention, the head motion detecting section 202 with the headphone 202a is configured and arranged to directly detect the motion of the viewer's head.

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<sup>1</sup> All of the limitations of intervening claim 2 were **not** added to claim 1.

In both embodiments, a value that is indicative of a movement of a head portion of the viewer is determined by estimating or detecting the movement of the head portion. Thus, Applicants believe the limitation of "**determining** a viewer motion value indicative of a movement of a head portion of the viewer" as amended in claim 1 is not indefinite.

Second, as discussed above, the viewer motion determining section as now recited in claim 1 is directed to the passenger motion estimating section 104 in the first embodiment and the head motion detecting section 202 in the second embodiment. In order to provide a clear antecedent basis for the viewer motion determining section as recited in claim 1 in the specification, Applicants have amended the paragraph [00141] of the specification as indicated above.

Third, Applicants respectfully submit the amount of reliability is not specifically claimed in the present invention, and thus, the amount of reliability in estimating the movement of the head portion is not relevant in determining the indefiniteness of a claim under 35 U.S.C. §112. In other words, in the present case, the Examiner's perception as to whether the determination of the viewer motion value can be made accurately and reliably by the sensors should not affect the determination of indefiniteness under 35 U.S.C. §112.

Applicants believe that the claims 3, 4, 7-8, 18 and 19 comply with 35 U.S.C. §112, second paragraph. Withdrawal of the rejections is respectfully requested.

### ***Rejections - 35 U.S.C. § 103***

In paragraphs 15 to 17 of the Office Action, claims 1-6 and 9-20 stand rejected in view of U.S. Patent No. 6,317,114 to Abali et al. (hereinafter "Abali et al. patent"), U.S. Laid Open Patent Publication No. 2002/0099257 to Parker et al. (hereinafter "Parker et al. publication"), and/or U.S. Patent No. 5,691,471 to Okazaki et al. (hereinafter "Okazaki et al. patent").



REJECTION BASED ON ABALI ET AL. PATENT

In paragraph 15 of the Office Action, claims 1-3, 9-14 and 16-20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over the Abali et al. patent. In response, Applicants have amended independent claims 1, 9, 18 and 20 as mentioned above. However, Applicants believe claims 11 and 12 are patentable over the Abali et al. patent, and thus, respectfully traverse the prior art rejection as it is applied to claims 11 and 12.

More specifically, independent claims 1, 19 and 20 now clearly recite that the display device is configured to determine a viewer motion value indicative of the movement of a head portion of a viewer, and to adjust a display position of the image based on a *relative displacement* between the display section and the head portion of the viewer. Clearly this arrangement is *not* disclosed or suggested by the Abali et al. patent or any other prior art of record.

The Abali et al. patent discloses determining *only* the movement of the display section, and not the movement of the head portion of the viewer. Although the Abali et al. patent discloses shifting the image displayed in the display section such that the image remains substantially stationary in relation to a viewer's gaze, the display device disclosed in the Abali et al. patent does not take the viewer's movement into account at all. More specifically, the Abali et al. patent merely assumes the observer's eyes reference frame 3 is set in the same plane as that of the display device 10 (column 3, lines 42-44). Thus, in the Abali et al. patent, the displayed image 2 is kept "stationary with respect to the *stationary* reference frame (e.g., in this case the observer's eye 4)" (emphasis added) (column 3, lines 54-56). Accordingly, shifting of the image displayed in the display section is performed solely based on the movement of the display section with respect to the stationary reference

plane, which does not take the movement of the viewer into account at all. Thus, the Abali et al. patent *fails* to disclose or suggest determining a viewer motion value indicative of the movement of a head portion of a viewer as recited in independent claims 1, 19 and 20. Therefore, the Abali et al. patent also *fails* to disclose or suggest adjusting a display position of the image based on a *relative displacement* between the display section and the head portion of the viewer as recited in the independent claims. Accordingly, Applicants believe the Abali et al. patent does *not* render independent claims 1, 19 and 20, as now amended, unpatentable under either 35 U.S.C. §102(b) or 35 U.S.C. §103(a).

More specifically, it is well settled under U.S. patent law that for a reference to anticipate a claim under 35 U.S.C. §102(b), the reference must disclose *each* and *every* element of the claim within the reference. As mentioned above, the Abali et al. patent clearly fails to disclose determining a viewer motion value indicative of the movement of a head portion of a viewer, and adjusting a display position of the image based on a *relative displacement* between the display section and the head portion of the viewer as recited in independent claims 1, 19 and 20, as now amended. Therefore, Applicants respectfully submit that independent claims 1, 19 and 20, as now amended, are not anticipated by the prior art of record.

Moreover, in order for a prior art reference to render a claim obvious under 35 U.S.C. §103(a), the mere fact that the prior art can be modified does *not* make the modification obvious, unless the prior art *suggests* the desirability of the modification. As mentioned above, the basic premise of the image shift control disclosed in the Abali et al. patent is that the observer's eye 3 is a stationary plane. In other words, in the Abali et al. patent, the movement of the viewer is not taken into account in any way in calculating the shift amount of the image displayed in the display section. Accordingly, the Abali et al. patent lacks any

suggestion or expectation of success for modifying the patent to create the Applicants' unique arrangement of the display device as now recited in independent claims 1, 19 and 20.

Furthermore, Applicants believe that the dependent claims 2, 3, 17 and 18 are also allowable over the prior art of record in that they depend from independent claim 1, and therefore are allowable for the reasons stated above. Also, the dependent claims 2, 3, 17 and 18 are further allowable because they include additional limitations. Thus, Applicants believe that since the prior art of record does not disclose or suggest the invention as set forth in independent claim 1, the prior art of record also fails to disclose or suggest the inventions as set forth in the dependent claims.

Regarding claim 9, Applicants have amended this claim to rewrite in independent form and to add the limitation that the center deviation is computed "based on a translated position of the display section" to overcome the indefiniteness rejection as discussed above. Moreover, claim 9 has been amended to recite adjusting a display position of the image within the display region of the display section based *simultaneously* on the translational displacement of the display section and the center deviation. For example, as described in the paragraph [00115] and step S500 in Figure 12 of the present application, the image shift amount  $\Delta X_T$  is calculated in Equation (2) based simultaneously on the screen movement amount  $\Delta X_H$  (translational displacement) and the average screen movement amount  $X_M$  multiplied by A in order to bring the center of the displayed image closer to the center of the display region of the image display section (center deviation). Clearly, this arrangement now recited in claim 9 is not disclosed or suggested by the Abali et al. patent or any other prior art of record.

In the Abali et al. patent, shifting of the image based on the center deviation (or "re-centering") is performed *separately* from shifting of the image to compensate for the motion

of the display section. More specifically, as shown in Figure 7E of the Abali et al. patent, the re-centering operation is performed 1 to 10 seconds after the image shifting due to the movement of the display section is performed (column 7, lines 24-30). The Abali et al. patent explicitly distinguishes this re-centering operation from the image shifting due to the movement of the display section, and states "[r]e-centering is performed slowly at a pace so that the human eye can track the image easily" as opposed to the image shifting due to the movement of the display section conducted to keep the image stationary with respect to the reference plane (i.e., image shifting cannot be tracked). Thus, the Abali et al. patent *fails* to disclose or suggest adjusting a display position of the image within the display region of the display section based *simultaneously* on the translational displacement of the display section and the center deviation, as now recited in claim 9. Accordingly, Applicants believe claim 9, as now amended, is patentable over the prior art of record.

Moreover, Applicants believe that the dependent claims 10, 13 and 14 are also allowable over the prior art of record in that they depend from independent claim 9, and therefore are allowable for the reasons stated above. Also, the dependent claims 10, 13 and 14 are further allowable because they include additional limitations. Thus, Applicants believe that since the prior art of record does not disclose or suggest the invention as set forth in independent claim 9, the prior art of record also fails to disclose or suggest the inventions as set forth in the dependent claims.

Regarding claim 11, Applicants respectfully disagree with the assertion of the Office Action that the limitations recited in claim 11 are obvious in view of the Abali et al. patent. Thus, Applicants have amended claim 11 to rewrite this claim in independent form.

More specifically, Applicants believe the Abali et al. patent *fails* to disclose or suggest *stopping computing the center deviation* upon determining that the vehicle is

accelerating or decelerating as recited in claim 11. The Office Action asserts the limitations in claim 11 are obvious in view of the description in the Abali et al. patent that mentions an anti-biasing circuit to compensate constant acceleration. According to the Abali et al. patent, the anti-biasing circuit is used to compensate for constant acceleration for an environment with long periods of relatively constant acceleration (see column 7, lines 53-56). From this description of the anti-biasing circuit, it is only inferred that the anti-biasing circuit may be used to cancel the re-centering of the image *only* by an amount of displacement caused by the constant acceleration, because the anti-biasing circuit is used for compensating the displacement caused by the acceleration. In other words, in the Abali et al. patent, when there is a movement of the display section that is not caused by the acceleration when the display section is placed under constant acceleration condition, the image is still shifted, and then re-centered because the anti-biasing circuit would *not* compensate for the movement of the display section caused by other than the constant acceleration. Therefore, there will be a situation in the Abali et al. patent in which the center deviation is still computed and re-centering is performed even when the acceleration or deceleration is detected. Accordingly, the Abali et al. patent fails to disclose or suggest *stopping computing the center deviation* upon determining that the vehicle is accelerating or decelerating as recited in claim 11. Thus, Applicants believe claim 11 is patentable over the Abali et al. patent.

Moreover, Applicants believe that the dependent claim 12 is also allowable over the prior art of record in that they depend from independent claim 11, and therefore are allowable for the reasons stated above. Also, the dependent claim 12 is further allowable because they include additional limitations. Thus, Applicants believe that since the prior art of record does not disclose or suggest the invention as set forth in independent claim 11, the prior art of record also fails to disclose or suggest the inventions as set forth in the dependent claim.

Therefore, Applicants respectfully request that this rejection be withdrawn in view of the above comments and amendments.

REJECTION BASED ON ABALI ET AL. PATENT AND PARKER ET AL. PUBLICATION

In paragraph 16 of the Office Action, claims 4-6 were rejected under 35 U.S.C. §103(a) as being unpatentable over the Abali et al. patent in view of the Parker et al. publication. Applicants respectfully disagree with this assertion of Office Action that the limitations recited in claim 4 are obvious over the Abali et al. patent in view of the Parker et al. publication. Although claim 4 has been cancelled in this Amendment as indicated above, the limitations that are substantially similar to the limitations recited in claim 4 have been added in independent claims 1, 19 and 20. Applicants respectfully submit independent claims 1, 19 and 20 are not obvious over the prior art of record for the following reasons.

As mentioned above, independent claims 1, 19 and 20 now clearly recite that the display device is configured to determine a viewer motion value indicative of the movement of a head portion of a viewer, and to adjust a display position of the image based on a *relative displacement* between the display section and the head portion of the viewer. Clearly this arrangement is *not* disclosed or suggested by the Abali et al. patent or any other prior art of record as discussed above. Moreover, Applicants believe the Parker et al. publication does not provide for the deficiency of the Abali et al. patent to render claims 1, 19 and 20 obvious.

As stated in the Office Action, the Parker et al. publication is directed to a display device that is configured to cancel feelings of motion sickness caused by vibration and movements. Also as mentioned in the Office Action, the Parker et al. publication is not limited to head mounted displays because the Parker et al. publication discloses embodiments directed to the non-head mounted display and embodiments directed to the head-mounted display. However, in either case (head-mounted display or non-head mounted display), the

Parker et al. publication discloses detecting **only** the movement of platform (environment) to which the display device is coupled.

The Parker et al. publication states in its paragraph [0040] "[i]t is assumed that if the motion of the environment is monitored with such sensors, the user will be subject to the motion of the environment and will therefore sense the **same** motion monitored by the sensors" (emphasis added). In other words, the Parker et al. publication presumes the user of the display device moves together with the movement of the environment, and thus, the Parker et al. publication detects **only** the movement of the environment. As referring to the embodiment directed to the head-mounted display, the Parker et al. publication discusses "[s]ince the display is head-fixed, it is important to track the motion of the observer's head". In other words, in the embodiments of the Parker et al. publication directed to the head-mounted display, the motion of the head is detected simply because the display section is mounted on the head. In other embodiments of the Parker et al. publication directed to the non-head mounted display, **only** the movement of the platform (environment) on which the display section is mounted is detected similarly to the Abali et al. patent. Accordingly, the Parker et al. publication also fails to disclose or suggest adjusting a display position of the image based on a **relative displacement** between the display section and the head portion of the viewer.

Thus, even if the Abali et al. patent and the Parker et al. publication are combined as asserted in the Office Action, the combination of the Parker et al. publication and the Abali et al. patent merely discloses a non-head mounted display device configured to shift the image based **only** on the movement of the display section (or movement of the environment in which the display section is mounted to), but **not** on the relative displacement between the display section and the head portion of the viewer. Thus, the combination of the two

references would **not** render independent claims 1, 19 and 20 obvious. Accordingly, Applicants believe independent claims 1, 19 and 20 are patentable over the prior art of record.

Moreover, Applicants believe that the dependent claims 5 and 6 are also allowable over the prior art of record in that they depend from independent claim 1, and therefore are allowable for the reasons stated above. Also, the dependent claims 5 and 6 are further allowable because they include additional limitations. Thus, Applicants believe that since the prior art of record does not disclose or suggest the invention as set forth in independent claim 11, the prior art of record also fails to disclose or suggest the inventions as set forth in the dependent claims.

Therefore, Applicants respectfully request that this rejection be withdrawn in view of the above comments.

REJECTION BASED ON ABALI ET AL. PATENT AND OKAZAKI ET AL. PATENT

In paragraph 17 of the Office Action, claim 15 was rejected under 35 U.S.C. §103(a) as being unpatentable over the Abali et al. patent in view of the Okazaki et al. patent. Applicants respectfully disagree with this assertion of Office Action that the limitations recited in claim 15 are obvious over the Abali et al. patent in view of the Okazaki et al. patent. Thus, Applicants have amended claim 15 to rewrite this claim in independent form.

The display device recited in claim 15 specifically requires to compute the translational displacement divided into a low frequency displacement and a high frequency displacement and to adjust the display position of the image based on the low frequency displacement and the high frequency displacement when the vehicle is accelerating or decelerating, and based on the high frequency displacement when the vehicle is not accelerating or decelerating. Clearly, this arrangement of the display device is not disclosed



or suggested by the Abali et al. patent or the Okazaki et al. patent, whether taken singularly or in combination.

More specifically, the Office Action relies on a single sentence in the Abali et al. patent that mentions about the anti-biasing circuit for compensating the constant acceleration. However, this sentence in the Abali et al. patent never mentions specifically how the acceleration is compensated in the process of the image shifting due to the movement of the display section when the anti-biasing circuit is used. Thus, the *specific* limitation recited in claim 15 cannot be rendered obvious in view of the Abali et al. patent. In other words, assuming for the sake of the argument that the Abali et al. patent may suggest the anti-biasing circuit detects the low and high frequency components as acceleration component and vibration component asserted in the Office Action, the Abali et al. patent still *fails* to disclose or suggest the *specific* process of the image shifting in which the translational displacement is divided into a low frequency displacement and a high frequency displacement, and the display position of the image is adjusted based on the high frequency displacement alone or on the high frequency displacement and the low frequency displacement depending on whether or not the vehicle is accelerating or decelerating. Thus, without any description regarding how the acceleration component is used in image shifting, the Abali et al. patent *fails* to render the specific limitations recited in claim 15 obvious.

The Okazaki et al. patent fails to provide for the deficiency of the Abali et al. patent. The Okazaki et al. patent is directed to an acceleration and angular velocity detector, and fails to disclose or suggest how the low frequency component and the high frequency component of the vibration are used in image shifting in a display device. Thus, the Okazaki et al. patent also fails to disclose or suggest the specific limitations recited in claim 15.

Moreover, claim 16 has been amended so that this claim depends from independent claim 15. Applicants believe that the dependent claim 16 is also allowable over the prior art of record in that this claim depend from independent claim 15, and therefore is allowable for the reasons stated above. Also, the dependent claim 16 is further allowable because this claim includes additional limitations. Thus, Applicants believe that since the prior art of record does not disclose or suggest the invention as set forth in independent claim 15, the prior art of record also fails to disclose or suggest the inventions as set forth in the dependent claim.

Accordingly, Applicants believe claims 15 and 16 are allowable over the prior art of record. Thus, withdrawal of the rejection is respectfully requested.

***Allowable Subject Matter***

In page 23 of the Office Action, claims 7 and 8 were indicated as containing allowable subject matter. Applicants wish to thank the Examiner for this indication of allowable subject matter and the thorough examination of this application.

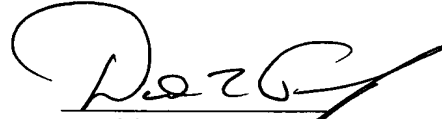
As discussed above, Applicants believe independent claim 1, now amended, is allowable over the prior art of record. Since claims 7 and 8 indirectly depend from independent claim 1, Applicants believe claims 7 and 8 are also allowable over the prior art of record for the reasons stated above.

\* \* \*

In view of the foregoing amendment and comments, Applicants respectfully assert that claims 1-3 and 5-20 are now in condition for allowance. Reexamination and reconsideration of the pending claims are respectfully requested.

Appl. No. 10/669,050  
Amendment dated March 3, 2005  
Reply to Office Action of January 10, 2005

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Tarnoff', with a long horizontal stroke extending to the right.

David L. Tarnoff  
Reg. No. 32,383

SHINJYU GLOBAL IP COUNSELORS, LLP  
1233 Twentieth Street, NW, Suite 700  
Washington, DC 20036  
(202)-293-0444  
Dated: 3-3-05

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Appl. No. 10/669,050  
Amendment dated March 3, 2005  
Reply to Office Action of January 10, 2005

**AMENDMENTS TO THE DRAWINGS:**

The attached replacement sheet of drawing includes a change to Figure 8. This replacement sheet includes Figure 8 and replaces the original sheet including Figure 8.

More specifically, Figure 8 is amended in the attached replacement sheet of drawing so that Figure 8 includes correct reference numerals for steps S280 to S310. In other words, the reference numerals S100 to S130 in the original sheet including Figure 8 were replaced with S280 to S310, respectively, in the attached replacement sheet of drawing.

Attachment: one (1) replacement sheet